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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES INVESTOR PROTECTION CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (SMB)

SIPA LIQUIDATION

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of Bernard L.
Madoff Investment Securities LLC,

Plaintiff,

v.

STANLEY I. LEHRER, in his capacity as administrator of the
Stanley I. Lehrer and Stuart M. Stein, J/T WROS, STUART M.
STEIN, individually, and in his capacity as administrator of the
Stanley I. Lehrer and Stuart M. Stein, J/T WROS, ARTHUR
SISKIND, LINDA SOHN, NEAL GOLDMAN, DOUGLAS
ELLENOFF, ELAINE STEIN ROBERTS, NEUBERGER BERMAN
LLC, as former custodian of an Individual Retirement Account for
the benefit of ELAINE STEIN ROBERTS, ARTHUR J. FEIBUS,
EUNICE CHERVONY LEHRER, ELAINE S. STEIN, ELAINE S.
STEIN REVOCABLE TRUST, JAMAT COMPANY, LLC, THE
MESTRO COMPANY, TRUST U/W/O DAVID L. FISHER,
TRUST U/T/A 8/20/90, and EVELYN FISHER, individually, and in
her capacity as Trustee for TRUST U/W/O DAVID L. FISHER and
TRUST U/T/A 8/20/90,

Defendants.

Adv. Pro. No. 10-05259 (SMB)

**MOTION OF STUART M. STEIN, ARTHUR SISKIND, ARTHUR J.
FEIBUS, JAMAT COMPANY, LLC AND THE MESTRO
COMPANY TO DISMISS THE AMENDED COMPLAINT**

PLEASE TAKE NOTICE THAT Stuart M. Stein, Arthur Siskind, Arthur J. Feibus, Jamat Company, LLC and The Mestro Company hereby move for an Order dismissing the Amended Complaint in this adversary proceeding pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure (made applicable by Fed. R. Bankr. P. 7012) at a date and time to be determined by the Court.

The Motion is based upon accompanying Memorandum of Law and the Declaration of Elise S. Frejka, and the exhibits annexed thereto, all pleadings and papers filed in these proceedings, and any other matters that may properly come before the Court in connection with this motion.

The Motion will be scheduled for further briefing, oral argument and submissions in accordance with the Litigation Case Management Procedures previously adopted by the Court.

Dated: New York, New York
June 2, 2014

KRAMER LEVIN NAFTALIS & FRANKEL LLP

By: /s/ Philip Bentley
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